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# MEMO ENDORSED

April 15, 2024

**BY ECF**

Hon. Edgardo Ramos  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

The forfeiture hearing scheduled for May 7, 2024, is adjourned to June 4, 2024, at 9:30 a.m. Any motions in limine shall be filed by May 28, 2024. Any opposition to motions in limine shall be filed by 12:00 p.m. on June 3, 2024. The Clerk of Court is respectfully directed to terminate the motions, Docs. 943, 945. SO ORDERED.



Edgardo Ramos, U.S.D.J.

Dated: April 16, 2024

New York, New York

Re: United States of America v. Herzl Meiri and Amir Meiri, et al.  
Case No. S4 15-cr-627 (ER)  
Our File No.: 3696-06258

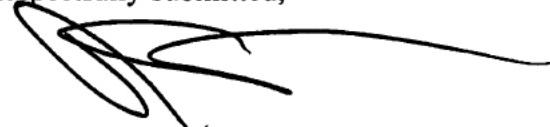
Dear Judge Ramos:

Our firm represents Petitioner Petermark II LLC (“Petermark”) regarding the 2146 and 2148 Fulton Street property. There is a request by the Government to adjourn the forfeiture hearing until June 4, 2024. We write to request a pre-motion conference for approval to move *in limine*.

We seek to file a motion *in limine* to preclude Nyamekye Holding Corp. (“Nyamekye”) from contesting and/or questioning Petermark’s bona fide purchaser claims. As the Court is aware, Petermark’s bona fide purchaser status between it and Nyamekye has already been determined in the State Court action by a final order. See attached. Accordingly, Nyamekye should be barred from questioning Petermark on this issue before this Court.

We acknowledge the Court has held the Government was not in privity with Nyamekye and, as such, we will not seek to preclude the Government from questioning Petermark regarding its bona fide purchaser status.

Respectfully submitted,



David K. Fiveson, Esq.

DKF/rqs